



State of California  
**Respiratory Care Board**

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**Inquiry:** Due to the shortage of respiratory staffing, our hospital is looking at having LVN's overlap and work in the respiratory department at night and do nebulizer treatments. In addition, they want these LVN's to chart for these treatments on the respiratory treatment sheets, just like any other Respiratory Care Practitioner. These LVN's would be under respiratory's management and their hours would be charged to the respiratory department. The question is if this practice is legal, can the LVN's document on the RT charting, and is it appropriate to have RT's completing the LVN competencies for nebulizer administration?

**Response:** The Respiratory Care Board does not have jurisdiction over the scope of practice for Licensed Vocational Nurses. It is therefore recommended, that you contact their licensing board for clarification on their acceptable practices. Their contact information is listed below:

Board of Vocational Nursing  
2535 Capitol Oaks Drive # 205  
Sacramento, CA 95833  
(916) 263-7800

It is very appropriate to have the licensed Respiratory Practitioner perform competency training for skills allowed by other licensing boards that are cardiopulmonary in nature.

With regards to documentation, each facility and any appropriate statutes govern that decision. It is not a function of the Board to regulate this practice.

Reference # 2002-C-25